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October 23, 2023

The Honourable Diane Lebouthillier

Minister of Fisheries, Oceans and the Canadian Coast Guard

via email

Dear Minister Lebouthillier:

Re: Open Net-Pen Aquaculture, Lake Huron, Ontario

The Georgian Bay Association (GBA) extends congratulations and wishes you well upon accepting your new appointment as Minister of Fisheries, Oceans and the Canadian Coast Guard.

We wish to introduce you to the unique issues your office will face regarding open net-pen (cage) aquaculture in the Great Lakes. These issues will require a coordinated effort by your department (DFO), Environment and Climate Change Canada (ECCC), and the Ontario Ministries of Natural Resources and Forestry (MNRF) and Environment, Conservation and Parks (MECP) regarding the oversight of cage aquaculture operations in Georgian Bay and parts of Lake Huron, and include:

- ensuring compliance with the Great Lakes Water Quality Agreement (GLWQA), particularly given the increasing risk of nutrient release causing algae outbreaks in nearshore regions due to warming water temperatures;
- reducing the potential impact of open cage fish farms on native fish and invertebrate communities and their habitats;
- recognizing the importance of Indigenous participation in the fish farming industry and their experience and knowledge; and
- moving the open cage aquaculture industry to enclosed, onshore, land-based facilities and providing incentives and support to effect such a move.

GBA is an umbrella organization for 18 community associations along the east and north shores of Georgian Bay, representing approximately 3,000 families. We have been advocating on behalf of our members for over 100 years and estimate that we reach and influence around 30,000 residents of the Georgian Bay. Our mandate is to work with our water-based communities and other stakeholders to ensure the careful stewardship of the greater Georgian Bay environment.

The primary concerns that we have regarding the environmental impact of the open net-cage aquaculture industry in Lake Huron are:

- ❖ the effects of nutrient loading and sedimentation, particularly phosphorus loading, on reduction in water quality, hypoxic events, water transparency and algae production, and on the benthic invertebrate community, its species diversity, and its natural habitat;
- ❖ the effects on native, wild fish stocks by the inevitable escapements of domesticated rainbow trout or other new introduced species, and disease pathogens they may carry, and by the loss of fish habitat due to anoxic conditions caused by the farms; and,
- ❖ the possible effects of introducing chemotherapeutants, such as antibiotics, and/or other contaminants into the environment from medicated or contaminated feed sources.

The bi-national GLWQA guides Canada and the United States on reducing nutrient (i.e., phosphorus) input, chemical loading, habitat loss, invasive species, and several other threats, all impacted further by climate change that warms the waters and potentially leads to higher phosphorus levels and algae production. The Great Lakes Protection Act and various government and NGO-funded initiatives are dedicated to restoring the water quality of areas of concern due to degradation, but international cooperation and compliance are key to effecting ongoing change.

We emphasize these are fragile waters and important natural ecosystems. We believe that the province of Ontario is overseeing the industry in a way that lacks a long-range environmental sustainability strategy to protect these international waters. Neither Québec nor the eight U.S. States bordering the Great Lakes/St. Lawrence River System permit open net-pen aquaculture in these waters. In particular, the State of Michigan stated in a report that "... commercial net-pen aquaculture would pose significant risks to fishery management and other types of recreation and tourism."

The eastern and northern shores of Georgian Bay include the UNESCO Georgian Bay Biosphere, Mnidoo Gaami, the world's largest freshwater archipelago. For many Indigenous peoples, water is sacred, protected, and honoured as the giver of all life. GBA supports and respects Indigenous involvement in and consultation on regional aquaculture activities with a view towards their community developing viable, sustainable, land-based operations in the future. We encourage Indigenous participation in environmental stewardship of fish farming and natural resources and recognize the importance of education and training.

Your ministry is familiar with the risks and threats to native fisheries and other environmental impacts arising from aquaculture operations on the east and west coasts of Canada, and the public reaction to those risks, threats and impacts. We would ask you to recognize that the risks posed by freshwater aquaculture operations in Lake Huron are significantly greater due to factors such as: the much lower fetch/flushing than occurs in oceans; predominantly shallower waters; and other key differences between marine and freshwater environments.

Accordingly, we strongly recommend that there is a concerted effort made by all the relevant government agencies listed above to take steps to move this open net-cage freshwater industry into enclosed, land-based facilities, which would eliminate almost all these risks, threats and impacts and demonstrate strong and responsible environmental leadership. In order to bring about such a change, the industry will require support, but the applicable monitoring costs would be saved.

Additional background information can be found on our website:
<https://georgianbay.ca/fisheries/cage-aquaculture-issue/>.

We would welcome the opportunity to meet with your representatives to discuss these issues further.

We thank you for your attention and consideration.

Yours sincerely,



Rupert Kindersley
Executive Director

copy to:

Steven Guilbeault	Minister	Environment and Climate Change Canada
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Dominic LeBlanc	Minister	Public Safety, Democratic Institutions and Intergovernmental Affairs
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